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VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United Courthouse
40 Foley Square New York, New York 10007

MEMO ENDORSED

Re: *United States v. Oren Alexander*, No. 24-cr-00676 (VEC)

Dear Judge Caproni:

On behalf of Oren Alexander and Alon Alexander, we write pursuant to this Court's Individual Rules of Practice in Criminal Cases, Rule 3, to request redaction of various material to be filed in connection with our omnibus reply in support of pretrial motions, as well as redaction of the reply itself.

We seek redactions of material for which sealing is justified to protect various privacy interests that outweigh the public's right of access, including with respect to uncharged juvenile claims. The government does not oppose this request for redaction and has also requested limited redaction as to materials related to witness privacy and investigation. This Court has previously found that redaction in such circumstances is warranted. *See* DE:123 (finding that "[t]he interests in protecting the privacy of alleged victims and witnesses and maintaining the confidentiality of ongoing investigations, as well as the sensitive nature" of alleged "juvenile conduct" outweighs the public's presumption of access); DE:117 (stating the same).

With the filing of this letter, we will submit to the Court highlighted versions identifying the requested redactions.

Thank you for your consideration.

Respectfully submitted,

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Application GRANTED. The materials to be filed in redacted form are "judicial documents" to which the common law right of public access attaches. *United States v. Akhavan*, 532 F. Supp. 3d 181, 184 (S.D.N.Y. 2021) (quoting *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119–20 (2d Cir. 2006)). The weight of that presumption is moderate, as most of the redactions apply to Defendants' motion to suppress, and the redactions that bear on the "adjudication of a dispositive motion" are minimal. *Id.* at 185. The interests in protecting the privacy of alleged victims and witnesses and maintaining the confidentiality of ongoing investigations, as well as the sensitive nature of certain juvenile conduct, outweigh that presumption.

SO ORDERED.



8/19/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE